

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
v.)	No. 4:14CR323 CDP
)	
JAMIE ALLEN STIRES)	
)	
Defendant.)	

DEFENDANT’S OBJECTION TO PRESENTECE REPORT

Comes now Defendant, Jamie Allen Stires, through his attorney, Bevy Beimdiek, Assistant Federal Public Defender, and hereby objects to the Presentence Report which lists the defendant’s alias as “Peter Pan.” In support of this objection, defendant states the following:

The Presentence Report identifies the defendant Jamie Stires and also lists as an “a/k/a” the name “Peter Pan.” Defendant has never used the name “Peter Pan”. When police inspected the phone of the 12 year old victim, the defendant was listed as “Peter Pan” in her phone. (PSR ¶ 12). There is no evidence that the defendant ever used “Peter Pan” as his alias. The fact that the victim identified the defendant in her cell phone under that name does not mean that the defendant used this name or ever asked the victim to call him by that name. In fact there is no evidence in any of the discovery provided by the government that the defendant himself ever used the name “Peter Pan.”

WHEREFORE, Defendant respectfully requests that the words “a/k/a “Peter Pan” be stricken from the Presentence Report.

Respectfully submitted,

/s/ Bevy A. Beimdiek

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2015, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Jennifer Winfield, Assistant United States Attorney.

/s/ Bevy A. Beimdiek
BEVY A. BEIMDIEK
Assistant Federal Public Defender